

EXHIBIT 1

From: [McKeeby, Paulo B.](#)
Sent: Tuesday, May 9, 2023 6:23 PM
To: [Matthew B. Gilliam](#)
Cc: [Matt Hill](#); [Bobby Pryor](#); [Morris, Brian K.](#)
Subject: RE: Show Cause Hearing Subpoenas

We do not have a change in our position from yesterday. Please feel free to file your motion to compel as an opposed motion.

Paulo B. McKeeby
Partner
Labor & Employment

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469-680-4227

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From: Matthew B. Gilliam <mbg@nrtw.org>
Sent: Tuesday, May 9, 2023 11:00 AM
To: McKeeby, Paulo B. <PMcKeeby@reedsmith.com>; Morris, Brian K. <BMorris@reedsmith.com>
Cc: Matt Hill <mhill@pryorandbruce.com>; Bobby Pryor <bpryor@pryorandbruce.com>
Subject: RE: Show Cause Hearing Subpoenas

EXTERNAL E-MAIL - From mbg@nrtw.org

Paulo and Brian,

To clarify Paulo's email from yesterday, will the Southwest employees identified in its Notification Pleading (Doc. 410) and its privilege logs, authorize you to accept service of the attached subpoenas on their behalf today or at all? If not, can we coordinate a location, date, and time when and where they can be served?

Also, will Brian (who is also included in some of the communications) attend the hearing? If not, will Brian accept service of the attached subpoena?

Assuming that we cannot coordinate service of subpoenas on all these individuals to attend the May 23 Show-Cause hearing, we will have to file a motion with the Court seeking an order to compel their attendance, or, alternatively, request that Southwest provide us with a location,

date, and time each of the witnesses be served, and home addresses so that we can also attempt to serve them there. Given the difficulty of locating and serving witnesses before the hearing we will need to seek relief from the court unless Southwest is willing to either 1) agree to produce the witnesses, or 2) provide a location, date, and time each of the witnesses may be served with subpoenas.

We do have a home address for Sonya Lacore, which I believe we obtained last July. Can you confirm whether that is still her home address?

Please let us know these answers by the end of today as we will have to proceed accordingly if we do not receive confirmation one way or another.

Thanks,
Matt

Matthew B. Gilliam

Staff Attorney (*admitted and licensed to practice only in New York and West Virginia*)

c/o National Right to Work Legal Defense Foundation, Inc.

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External Signed

From: McKeeby, Paulo B. <PMcKeeby@reedsmith.com>

Sent: Monday, May 8, 2023 5:53 PM

To: Matthew B. Gilliam <mbg@nrtw.org>

Cc: Matt Hill <mhill@pryorandbruce.com>; Bobby Pryor <bpryor@pryorandbruce.com>; Morris, Brian K. <BMorris@reedsmith.com>

Subject: RE: Show Cause Hearing Subpoenas

To the extent you need an answer today, I do not have authority to accept service on behalf of the Southwest employees we understand you intend to subpoena or to provide you with the residential addresses of the employees. I can tell you once again that Chris Maberry with Southwest and I are planning on attending the hearing. You do not need to subpoena

me unless you prefer to do so. If you do, you can simply send me the subpoena via email instead of having it personally served on me.

Paulo B. McKeeby
Partner
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From: Matthew B. Gilliam <mbg@nrtw.org>
Sent: Monday, May 8, 2023 11:50 AM
To: McKeeby, Paulo B. <PMcKeeby@reedsmith.com>; Morris, Brian K. <BMorris@reedsmith.com>
Cc: Matt Hill <mhill@pryorandbruce.com>; Bobby Pryor <bpryor@pryorandbruce.com>
Subject: Show Cause Hearing Subpoenas

EXTERNAL E-MAIL - From mbg@nrtw.org

Paulo,

Can you confirm by the end of the day today whether you're willing to accept service of subpoenas for all of the individuals identified in your notice and on the privilege log? If not, please provide each of their addresses where they can be served, and we shall otherwise proceed.

Thanks,
Matt

Matthew B. Gilliam

Staff Attorney (*admitted and licensed to practice only in New York and West Virginia*)
c/o National Right to Work Legal Defense Foundation, Inc.
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External Signed

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